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August 13, 2021

VIA E-FILE AND E-MAIL

Hon. Victor Marrero
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

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Re: *Tecku, et al. v YieldStreet, Inc., et al.*, No. 1:20-cv-07327 (VM)

Dear Judge Marrero:

I write pursuant to Section 6 of the Court's Electronic Case Filing Rules & Instructions and Your Honor's Individual Rules of Practice to seek leave to file under seal certain materials in connection with Defendants' August 13, 2021 Supplemental Brief pursuant to the Court's July 30, 2021 Order. Our papers are due today pursuant to the Order and will be filed simultaneously.

Specifically, we seek leave to file under seal: Exhibits 1–2 comprising the Private Placement Memoranda governing Plaintiffs' investments; and Exhibits 3–8 comprising the Series Note Supplements for the offerings in which Plaintiffs invested. Each is confidential by its terms because it includes non-public sensitive commercial information. Although a protective order has not yet been entered in this matter, the documents are such that we expect them to be designated "Confidential" when such an order is entered. These same documents were previously filed under seal as attachments to the Declaration of Christopher Nutt (Dkt. 30) in support of Defendants' February 12, 2021 letter (Dkt. 29). *See* Letter Motion to Seal (Dkt. 27); Order Granting Letter Motion to Seal (Dkt. 32). Accordingly, Defendants respectfully request leave to file the confidential materials under seal.

Pursuant to Your Honor's Special Individual Rules of Practice in Light of COVID-19, Counsel for Defendants will submit a courtesy copy of all related motion papers and exhibits via email.

Respectfully,
/s/ Jonathan A. Shapiro
Jonathan A. Shapiro

cc: counsel of record

